

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

SYMBOLOGY INNOVATIONS, LLC,

Plaintiff,

v.

UNDER ARMOUR, INC.,

Defendant.

C.A. No.: 5:20-cv-00890-BYP

JURY TRIAL DEMANDED

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY ALL DEADLINES

Now come Plaintiff, Symbology Innovations LLC, and Defendant, Under Armour, Inc. (collectively the “Parties”), by and through undersigned counsel and subject to the approval of this Court, and hereby file this Joint Notice of Settlement and Motion to Stay All Deadlines, and in support thereof, respectfully show the Court as follows:

All matters in controversy between the Parties have been settled in principle. The Parties are in the process of memorializing the terms of a written settlement agreement. The Parties anticipate that they will be able to perfect such terms within forty-five (45) days. Accordingly, the Parties respectfully request that the Court grant a stay of the proceedings between the Parties, including all deadlines, until August 14, 2020.

Good cause exists for granting this Joint Motion, as set forth above. The motion is not filed for purposes of delay but so that justice may be served.

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff conferred with Counsel for Defendant about the issues presented here.

Dated: July 1, 2020

Respectfully submitted,

SAND, SEBOLT & WERNOW CO., LPA

/s/ Howard L. Wernow

Howard L. Wernow (SBN 0089019)

Aegis Tower – Suite 1100

4940 Munson Street NW

Canton, Ohio 44718

Phone: (330) 244-1174

Fax: (330) 244-1173

Howard.Wernow@sswip.com

ATTORNEY FOR PLAINTIFF

BAKER HOSTETLER LLP

/s/Andrew E. Samuels

Andrew E. Samuels (SBN 90189)

200 Civic Center Drive, Suite 1200

Columbus, OH 43215-4138

Telephone: (614) 228-1541

Facsimile: (614) 462-2616

asamuels@bakerlaw.com

Katrina M. Quicker

Jason P. Grier

Baker & Hostetler LLP

1170 Peachtree Street, NE, Suite 2400

Atlanta, GA 30309-7676

Telephone: (404) 459-0050

Facsimile: (404) 459-5734

kquicker@bakerlaw.com

jgrier@bakerlaw.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on July 1, 2020, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Howard L. Wernow
Howard L. Wernow